

## Venegas, Victoria, EMNRD

---

**From:** Venegas, Victoria, EMNRD  
**Sent:** Thursday, February 20, 2020 3:20 PM  
**To:** 'Gonzales, Clair'; Rob Kirk; Bratcher, Mike, EMNRD; Hamlet, Robert, EMNRD; Eads, Cristina, EMNRD  
**Cc:** blm\_nm\_cfo\_spill@blm.gov  
**Subject:** RE: NAB1928444103 OXY SAND DUNES LINE

### RE: NAB1928444103 OXY SAND DUNES LINE

Ms. Gonzalez,

Per Rule NMAC 19.15.29.12.D.(1):

- *(c) Alternately, without division approval, the responsible party may elect to perform a composite and grab sample plan of the remediated area where each composite sample is not representative of more than 200 square feet.*
- *(2) If all composite and grab sample concentrations are less than or equal to the parameters listed in Table I of 19.15.29.12 NMAC or any conditions of approval, then the responsible party may proceed to backfill any excavated areas.*

Please, review and make the required corrections prior to resubmitting the updated report through the fee portal.  
Regards,

Victoria Venegas  
State of New Mexico  
Energy, Minerals, and Natural Resources  
Oil Conservation Division  
811 S. First St., Artesia NM 88210  
(575) 748-1283  
[Victoria.Venegas@state.nm.us](mailto:Victoria.Venegas@state.nm.us)

OCD approval does not relieve the operator of liability should their operations fail to adequately investigate and remediate contamination that may pose a threat to groundwater, surface water, human health or the environment. In addition, OCD approval does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

---

**From:** Gonzales, Clair <Clair.Gonzales@tetrattech.com>  
**Sent:** Thursday, February 20, 2020 1:45 PM  
**To:** Venegas, Victoria, EMNRD <Victoria.Venegas@state.nm.us>; Rob Kirk <rob.kirk@solarismidstream.com>; Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Hamlet, Robert, EMNRD <Robert.Hamlet@state.nm.us>; Eads, Cristina, EMNRD <Cristina.Eads@state.nm.us>  
**Cc:** blm\_nm\_cfo\_spill@blm.gov  
**Subject:** [EXT] RE: NAB1928444103 OXY SAND DUNES LINE

Ms. Venegas,

Would it be acceptable to perform the horizontal delineation during the remediation activities? We would install horizontal sample points around the perimeter of the release, and email the laboratory data and updated site map immediately for your approval.

To address the NMOCD Reclamation Standards by Rule [19.15.29.13](#), Solaris proposes to perform reseeding at the site once the remediation is completed. Reseeding will be performed in June 2020 to coincide with the rainy season in Southeastern New Mexico and aid in revegetation. Based on the soils at the site, the BLM Loamy (L) Sites Seed Mixture will be used and will be planted in the amount specified in the pounds pure live seed (PLS) per acre. The seed mixture will be spread by a drill equipped with a depth regulator or a handheld broadcaster and raked. If a hand-held broadcaster is used for dispersal, the pounds PLS per acre will be doubled. The soil survey information and BLM seed mixture to be used is attached.

Thank you,

**Clair Gonzales,**

**Clair Gonzales, P.G. | Project Manager**

Phone: 432.687.8123 | Mobile 432.260.8634 | Fax: 432.682.3946

[clair.gonzales@tetrattech.com](mailto:clair.gonzales@tetrattech.com)

Tetra Tech | Complex World, CLEAR SOLUTIONS™

901 West Wall Street, Ste 100 | Midland, TX 79701 | [www.tetrattech.com](http://www.tetrattech.com)

PLEASE NOTE: This message, including any attachments, may include privileged, confidential and/or inside information. Any distribution or use of this communication by anyone other than the intended recipient is strictly prohibited and may be unlawful. If you are not the intended recipient, please notify the sender by replying to this message and then delete it from your system.

---



**From:** Venegas, Victoria, EMNRD <[Victoria.Venegas@state.nm.us](mailto:Victoria.Venegas@state.nm.us)>

**Sent:** Wednesday, February 19, 2020 12:25 PM

**To:** Rob Kirk <[rob.kirk@solarismidstream.com](mailto:rob.kirk@solarismidstream.com)>; Bratcher, Mike, EMNRD <[mike.bratcher@state.nm.us](mailto:mike.bratcher@state.nm.us)>; Hamlet, Robert, EMNRD <[Robert.Hamlet@state.nm.us](mailto:Robert.Hamlet@state.nm.us)>; Eads, Cristina, EMNRD <[Cristina.Eads@state.nm.us](mailto:Cristina.Eads@state.nm.us)>

**Cc:** [blm\\_nm\\_cfo\\_spill@blm.gov](mailto:blm_nm_cfo_spill@blm.gov); Gonzales, Clair <[Clair.Gonzales@tetrattech.com](mailto:Clair.Gonzales@tetrattech.com)>

**Subject:** NAB1928444103 OXY SAND DUNES LINE

 **CAUTION:** This email originated from an external sender. Verify the source before opening links or attachments. 

**NAB1928444103 OXY SAND DUNES LINE**

Mr. Kirk,

The NMOCD has received your Remediation Plan for **NAB1928444103** OXY SAND DUNES LINE, thank you. This remediation plan is denied for the following reason:

- Horizontal delineation has not been completed. The edges -horizontal definition- of a liquid release must be determined. A visual footprint on the surface is not sufficient or adequate to assess the horizontal extent of the release.
- Since the release was not on an active pad or production facility, the top 4 feet must meet the NMOCD Reclamation Standards by Rule [19.15.29.13](#).

Please let me know if you have any questions.

Victoria Venegas

State of New Mexico  
Energy, Minerals, and Natural Resources  
Oil Conservation Division  
811 S. First St., Artesia NM 88210  
(575) 748-1283  
[Victoria.Venegas@state.nm.us](mailto:Victoria.Venegas@state.nm.us)

OCD approval does not relieve the operator of liability should their operations fail to adequately investigate and remediate contamination that may pose a threat to groundwater, surface water, human health or the environment. In addition, OCD approval does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.